

JASON M. FRIERSON  
United States Attorney  
Nevada Bar No. 7709  
STEVEN J. ROSE  
Assistant United States Attorney  
Nevada Bar No. 13575  
[Steven.Rose@usdoj.gov](mailto:Steven.Rose@usdoj.gov)  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
PHONE: (702) 388-6336  
*Attorneys for the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT BUCKHANNON,

Defendant.

Case No.: 2:22-cr-00040-JCM-EJY

**STIPULATION TO EXTEND  
RESPONSE DEADLINE TO  
DEFENDANT'S MOTION FOR  
EARLY TERMINATION OF  
SUPERVISED RELEASE [ECF No. 7]**

**(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Steven Rose, Assistant United States Attorneys, Counsel for the United States of America; and Gia Marina, Counsel for Robert Buckhannon, that the Government's deadline to respond to Defendant's Motion for Early Termination of Supervised Release [ECF No. 7], currently set for June 23, 2023, be vacated and continued to July 7, 2023.

This Stipulation is entered into for the following reasons:

1. Defendant Robert Buckhannon is currently on supervision through the United States Probation Office in two cases: 2:14-cr-00315-JCM-VCF, and the instant case 2:22-cr-00040-JCM-EJY.

1           2.       Previously, Defendant was sentenced to three years probation. Judgment,  
2       *United States v. Buckhannon*, No. 2:14-cr-00315-JCM-VCF (D. Nev. June 7, 2018) [ECF No.  
3       112]. Separately, Defendant was sentenced to 24 months in prison, followed by a 3 year  
4       term of supervised release. Judgment, *United States v. Buchkhannon*, No. 1:18-cr-00169-JTN-1  
5       (S.D. Mich. Feb. 13, 2020) [ECF. No. 86]. In 2022, Defendant's term of supervised release  
6       was transferred to Nevada. Order Accepting Jurisdiction Transfer of Probation/Supervised  
7       Release, *United States v. Buckhannon*, No. 2:22-cr-00040-JCM-EJY (D. Nev. Feb. 25, 2023)  
8       [ECF Nos. 2, 5].

9           3.       On June 9, 2023, Defendant filed motions seeking early termination of  
10       probation/supervised release in each case. Motion, No. 2:14-cr-00315-JCM-VCF (D. Nev.  
11       June 9, 2023) [ECF No. 141]; Motion, No. 2:22-cr-00040-JCM-EJY (D. Nev. June 9, 2023)  
12       [ECF No. 7].

13          4.       Counsel for the government has had communications with the United States  
14       Probation Office regarding Defendant's projected expiration date or dates for his terms of  
15       probation and supervised release. The communication received from the Probation Office is  
16       different from the projected date contained in Defendant's motions.

17          5.       Counsel for the government and Counsel for Defendant anticipate discussing  
18       Defendant's motions and the position the government intends to take, and those discussions  
19       may not be completed before the June 23, 2023 deadline for the government's response.

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Respectfully submitted this 22nd day of June, 2023.

/s/ Gia Marina  
GIA MARINA  
Attorney for Defendant

/s/ Steven J. Rose  
Assistant United States Attorney  
Attorney for Plaintiff

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4                                   Plaintiff,

5                                   v.

6 ROBERT BUCKHANNON,

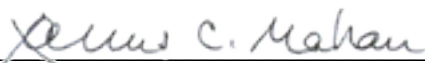
7                                   Defendant.  
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Case No.: 2:22-cr-00040-JCM-EJY

**ORDER**

9           IT IS THEREFORE ORDERED that the Government's deadline to respond to  
10 Defendant's Motion to for Early Termination of Supervised Release, currently set for  
11 June 23, 2023, is vacated and continued to July 7, 2023.

12           DATED June 23, 2023.

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15                                   HONORABLE JAMES C. MAHAN  
16                                   UNITED STATES DISTRICT JUDGE  
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